

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION</b>	§	No. 2:18-md-02323-AB
	§	MDL No. 2323
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<b>Kevin Turner and Shawn Wooden, <i>on behalf of themselves and</i> others similarly situated, Plaintiffs,</b>	§	
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<b>v.</b>	§	
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<b>National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc., Defendants.</b>	§	
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<b>THIS DOCUMENT RELATES TO: ALL ACTIONS</b>	§	
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**NOTICE OF INTENT TO ARGUE**

Pursuant to this Court's Amended Order for Hearing (ECF 9970), Lance H. Lubel hereby provides notice of his intent to argue during the hearing to be held May 15, 2018. The docket entry that is the subject of Mr. Lubel's argument is as follows:

8725: Declaration of Lance H. Lubel in Opposition to Christopher Seeger's Proposed Allocation of Common Benefit Attorneys' Fees (10/27/17)

Additional docket entries that may be relevant to the argument include:

9860/61: Order and Memorandum

7151: Co-Lead Class Counsels' Petition for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of A Set-Aside of Five

Percent of Each Monetary Award and Derivative Claimant Award, and Case Contribution Awards to Class Representatives (2/13/17).

- 7176: Motion for Entry of Case Management Order Governing Applications for Attorneys' Fees; Cost Reimbursement; and Future Fee Set-Aside (2/21/17)
- 7354/55: Response in Opposition and Objections to Co-Lead Class Counsels' Petition for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of A Set-Aside of Five Percent of Each Monetary Award And Derivative Claimant Award, and Case Contribution Awards to Class Representatives (3/27/17).
- 7464: Co-Lead Class Counsels' Omnibus Reply Memorandum in Further Support of Petition for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of A Set-Aside of Five Percent of Each Monetary Award and Derivative Claimant Award, and Case Contribution Awards to Class Representatives (4/10/17).
- 7533: Response and Objections to Supplemental Evidence Offered in Co-Lead Class Counsels' Omnibus Reply in Support of Co-Lead Class Counsel's Petition for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of A Set-Aside of Five Percent of Each Monetary Award and Derivative Claimant Award, and Case Contribution Awards to Class Representatives (4/21/17).
- 7534: Motion for Leave to Serve Fee-Petition Discovery (4/21/17)
- 7605/06: Co-Lead Class Counsel's Motion to Strike or Disregard Unauthorized Sur-Reply 'Response and Objection' to Fee Petition Reply Papers or, Alternatively, to Accept Class Counsel's Sur-Surreply (5/5/17)
- 7626/27: Response in Opposition to Co-Lead Class Counsel's Motion to Strike or Disregard Unauthorized Sur-Reply 'Response and Objection' to Fee Petition Reply Papers or, Alternatively, to Accept Class Counsel's Sur-Surreply (5/12/17)
- 7710: Co-Lead Class Counsel's Reply Memorandum in Further Support of their Motion to Strike or Disregard Unauthorized Sur-Reply (5/19/17)
- 8310: Order to Show Cause regarding appointment of Professor William B. Rubenstein to serve as an expert on attorneys' fees (8/23/17)
- 8350: Response to the Court's Show Cause Order of August 23, 2017 Regarding Appointment of a Court Expert on Attorney Fees (8/31/17)
- 8376: Order appointing Professor William B. Rubenstein to serve as an expert on attorneys' fees (9/15/17)

- 8395: First Supplement in Support of Objections to and in Opposition to Co-Lead Class Counsel's Petition for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of A Set-Aside of Five Percent of Each Monetary Award and Derivative Claimant Award, and Case Contribution Awards to Class Representatives (9/20/17)
- 3710 Case Management Order 5
- 8396: Motion to Compel Compliance with Case Management Order No. 5 (9/20/17)
- 8440: Co-Lead Class Counsel's Consolidated Memorandum (i) in Opposition to Motion to Compel Compliance with CMO5, and (ii) in Response to Their Latest Unauthorized Post-Briefing Supplementation of their Objections to the Common Benefit Fee Petition (10/4/17)
- 8449: Reply in Support of Motion to Compel Compliance with Case Management Order No. 5 (10/12/17)
- 9510: Order denying Motion to Compel Compliance with CMO5 (12/5/17)
- 9526/27: Expert Report of Professor William B. Rubenstein and accompanying Order (12/11/17)
- 9536: Motion to Reconsider Fed. R. Evid. 706 Deposition and Motion for Extension of Time to Respond to the Expert Report of Professor William B. Rubenstein (12/19/17)
- 9554: Response to the Expert Report of Professor William B. Rubenstein (1/3/18)
- 9571: Reply of Professor William B. Rubenstein to Responses to Expert Report (1/19/18)
- 9576: Order regarding Surreplies to Professor William B. Rubenstein to Responses to Expert Report (1/23/18)
- 9588: Surreply Responding to the Reply of Professor William B. Rubenstein to Responses to Expert Report
- 8367: Order for a Detailed Submission on Lawyers' Fees (9/12/17)
- 8447: Declaration of Christopher A. Seeger In Support of Proposed Allocation of Common Benefit Attorney Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards to Class Representatives (10/10/17)
- 8448: Order regarding counter-declarations on attorneys' fees (10/12/17)

- 8728: Declaration of Steven C. Marks in Response to Co-Lead Counsel's Proposed Allocation of Common Benefit Attorneys' Fees and Expenses (10/27/17)
- 8727: Declaration of James T. Capretz in Response to Proposed Allocation of Common Benefit Attorney's Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards to Class Representatives (10/27/17)
- 8726: Response to the Declaration of Christopher A. Seeger Proposing an Allocation of Common Benefit Attorneys' Fees and Expenses (10/27/17)
- 8724: Declaration of Derriel C. McCorvey in Support of McCorvey Law, LLC's Opposition to Christopher Seeger's Proposed Allocation of Common Benefit Attorneys' Fees (10/27/17)
- 8722: Declaration of Charles S. Zimmerman in Response to Proposed Allocation of Common Benefit Attorney's Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards to Class Representatives (10/27/17)
- 8721: Declaration of Michael L. McGlamry Responding in Opposition to Christopher A. Seeger's Proposed Allocation of Common Benefit Attorneys' Fees, Payment of Common Benefit Expenses, and Payment of Case Contribution Awards to Class Representatives (10/27/17)
- 8720: Declaration of Anthony Tarricone in Opposition to Co-Lead Counsel's Allocation of Common Benefit Attorneys' Fees and Reimbursement of Expenses (10/27/17)
- 8719: Counter-Declaration of Thomas V. Girardi in Response to the Declaration of Christopher A. Seeger in Support of Proposed Allocation of Common Benefit Attorneys' Fees (10/27/17)
- 8709: Declaration of Gene Locks, Class Counsel, in Response to the Declaration of Christopher A. Seeger in Support of Proposed Allocation of Common Benefit Attorneys' Fees (10/27/17)
- 8701: Co-Lead Class Counsel Anapol Weiss's Proposed Alternative Methodology for the Allocation of Common Benefit Attorneys' Fees (10/27/17)
- 8697: Declaration of Bruce A. Hagen in Support of Hagen, Rosskopf & Earle's Opposition to Christopher A. Seeger's Allocation of Common Benefit Attorneys Fees (10/27/17)

- 8653: Counter Declaration of Craig R. Mitnick in Response to Co-Lead Class Counsel's Declaration for the Allocations of an Award of Common Benefit Attorneys' Fees (10/27/17)
- 8576: Declaration of David A. Rosen in Reponse to Co-Lead Class Counsel's Proposed Allocation of Common Benefit Attorneys' Fees (10/26/17)
- 8556: Counter-Declaration of Jason E. Luckasevic in Response to the Declaration of Christopher A. Seeger (10/26/17)
- 8934: Omnibus Reply Declaration of Christopher A. Seeger as to Responses, Objections, and Counter-Declartrations to Proposed Allocation of Common Benefit Attorneys' Fees (11/17/17)
- 9786: Motion of Class Counsel The Locks Law Firm for Appointment of Administrative Class Counsel (3/20/18)
- 9813: Joinder of Pope McGlamry in Motion by The Locks Law Firm for Appointment of Administrative Class Counsel (3/26/18)
- 9830: Joinder of Casey Gerry in Motion by the Locks Law Firm for Appointment of Administrative Class Counsel (3/28/18)
- 9834: Motion to Join Class Counsel Locks Law Firm's Request to Appoint Administrative Counsel and Request for A Hearing to Seek Court Intervention on the Settlement Implementation and the Processing of Claims (3/29/18)
- 9836: Joinder of JR Wyatt Law in Motion by The Locks Law Firm for Appointment of Administrative Counsel (3/29/18)
- 9839: Anapol Weiss, Co-Lead Counsel's Joinder in the Request for a Hearing Regarding the Necessity for Additional Supervision of the Administration of the Claims Settlement Process (3/29/18)
- 9842: Joinder by Kreindler & Kreindler LLP in the Motion by The Locks Law Firm for Appointment of Administrative Class Counsel (3/30/18)
- 9843: The Yerrid Law Firm and Neurocognitive Football Lawyers' (i) Partial Joinder of the Motion Brought By the Locks Law Firm for Appointment of Administrative Counsel, etc. (3/30/18)
- 9853: Motion to Join in the Motion of Class Counsel The Locks Law Firm for Appointment of Administrative Class Counsel (4/3/18)
- 9854: Joinder of Smith Stallworth PA in Motion by The Locks Law Firm for Appointment of Administrative Class Counsel (4/3/18)

- 9855: Joinder of Berkowitz and Hanna LLC in Motion of Class Counsel The Locks Law Firm, for Appointment of Administrative Class Counsel (4/3/18)
- 9856: Movants' Motion to Join in the Motion of Class Counsel The Locks Law Firm, for Appointment of Administrative Class Counsel (4/3/18)
- 9926: Motion for Reconsideration/New Trial (5/2/18)
- 23: Declaration of Lance H. Lubel Pursuant to the Court's Order Dated March 28, 2018 (filed in 2:18-md-02323-AB)

Date: May 11, 2018

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2018, I filed the foregoing through the Court's CM/ECF system, which will provide electronic notice to all counsel of record and constitutes service on all counsel of record, including the following:

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